



BART-Rule

Preliminary Concept for Public Information and Requesting Comments

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Overview

- Sources affected by BART requirements
- Sources exempted from BART requirements
- Options for implementation
- BART determination
- WI-DNR Concept of BART-rule for Wisconsin



Comments requested

- Alternative programs as BART-substitute beyond the options presented
- WI-DNR intends to address SO₂, NO_x and PM in the BART-rule.
- Site-specific evaluation of the criteria that need to be considered for BART determination
- What deviations from the EPA-Guidelines should be considered in the BART-rule?
- We welcome any other comments.



Introduction

- Best Available Retrofit Technology (BART) is a provision of the Regional Haze Regulation.
- EPA promulgated the Regional Haze Regulation to fulfill the CAA requirement which is “the prevention of any future, and remedying of any existing impairment of visibility in Class I areas”
- The regional Haze Regulation requires all states to revise their SIP and submit to EPA by December 17, 2007



BART-eligible sources

BART provision applies to stationary sources meeting the following criteria:

- Sources that are one of the 26 source categories listed in CAA
- Sources that began operation after August 7, 1962 and were in existence on August 7, 1977
- Sources that have a potential to emit greater than 250 tpy **SO₂, NO_x, or PM**



Sources Subject to BART

- BART-eligible sources are subject to BART if they may reasonably be anticipated to cause or contribute to any impairment of visibility in any Class I area
- States have the following choices:
 - **Consider the individualized impact of BART-eligible sources on visibility impairment**
 - All BART-eligible sources subject to BART
 - Showing that collectively none of the BART-eligible sources is subject to BART



BART-rule options

- Option 1: Implementation of BART
BART determination for all sources subject to BART
- Option 2: Alternative program as BART-substitute
A trading program for EGUs including the requirements of CAIR, RACT and BART as an alternative program that make greater reasonable progress than BART



BART determination

BART is the best system of continuous emission reduction taking into account

- The available retrofit control options
- The cost of compliance with control options
- Existing pollution controls
- The remaining useful life of the facility
- The energy and non-air quality environmental impacts of control options
- The visibility impacts analysis



BART level of Control

Likely outcome of BART determination:

- PM: represented by PM10,
MACT level of control may be sufficient
- SO₂ control for EGUs: 90 – 95% reduction
- NO_x emission limit for EGUs:
Lower than the presumptive emission limits for most cases



Purpose of the BART-rule

to establish:

- The level of control and the control technologies representing BART
- Schedules for compliance with BART (latest 2012)
- Commitment from each affected facility to install, operate and maintain the control systems according to the determined level of controls and schedules.



BART-rule elements

- DNR identifies BART-eligible sources
(10 EGUs, 16 non-EGUs)
- DNR identifies sources subject to BART
CALPUFF modeling using potential to emit data
and 0.5 deciview threshold, 98th percentile
(preliminary results: 9 EGUs, 4 non-EGUs)



BART-rule elements, ctd

- Facilities conduct the engineering analyses required for BART determination and submit it with all supporting documents to DNR.
- Averaging:
 - for NO_x: facility-wide (trading)
 - for SO₂, PM: among BART sources within a facility



BART-rule elements, ctd

- DNR determines interim BART requirements (the level of control representing BART and schedules for compliance, latest 2012.
- Facility commitment (Administrative Order)
- BART requirements are subject to EPA approval
- Final BART requirements probably in 2008



Comments requested for BART-rule

- Are there any alternative programs as BART-substitute beyond the options presented?
- Are there comments regarding pollutants to be addressed in the BART-rule?
- Are there comments regarding how to evaluate the criteria for BART determination?
- What deviations from the EPA-Guidelines should be considered in the BART-rule?
- We welcome any other comments.